

## ATTACHMENT 1

### Response to Question 9

Intelsat USA License Corp. requests streamlined processing of this application pursuant to Section 63.12 of the Commission's Rules. This Application qualifies for streamlined processing because Intelsat USA License Corp. has no affiliation with a foreign carrier, has no affiliation with a dominant U.S. carrier whose international switched or private line services Intelsat seeks authority to resell, and does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of such services.

Intelsat USA License Corp. agrees, pursuant to the *Intelsat/Zeus Merger Order*,<sup>1</sup> the *Comsat Non-Dominance Order*,<sup>2</sup> and the *Comsat Alternative Rate Regulation Order*,<sup>3</sup> to regulation as a "dominant" international carrier on "thin routes" in its provision of capacity for switched-voice and private line services, subject to the alternative rate regulation set out in the *Comsat Alternative Rate Regulation Order*.<sup>4</sup>

### Response to Question 11

Intelsat USA License Corp. certifies that it is not a foreign carrier and is not currently affiliated with any foreign carrier.

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<sup>1</sup> *Intelsat, Ltd., Transferor, and Zeus Holdings Limited, Transferee, Consolidated Application for Consent to Transfers of Control of Holders of Title II and Title III Authorizations and Petition for Declaratory Ruling under Section 310 of the Communications Act of 1934, as Amended*, Order and Authorization, 19 FCC Rcd 24820 ¶ 50 (2004).

<sup>2</sup> *Comsat Corporation Petition Pursuant to Section 10 (c) of the Communications Act of 1934, as amended, for Forbearance from Dominant Carrier Regulation and for Reclassification as a Non-Dominant Carrier*, Order and Notice of Proposed Rulemaking, 13 FCC Rcd 14083 (1998).

<sup>3</sup> *Comsat Corporation, Policies and Rules for Alternative Incentive Based Regulation of Comsat Corporation*, Report and Order, 14 FCC Rcd 3065 (1999).

<sup>4</sup> *See also International Authorizations Granted*, Public Notice, Rep. No. TEL-00814, DA No. 04-2251 (rel. Jul. 22, 2004).

## ATTACHMENT 2

### Response to Question 14

After completion of the transaction, the following entities will hold a ten percent (10%) or greater ownership interest in international Section 214 authorization holder Intelsat USA License Corp.:

Name: Intelsat USA Sales Corp.  
Address: 3400 International Drive, N.W.  
Washington, D.C. 20008  
Percentage Held: 100% equity  
Citizenship: USA  
Principal Business: Communications

The following entity will hold a direct ownership interest in Intelsat USA Sales Corp. and a ten percent (10%) or greater indirect ownership interest in Intelsat USA License Corp.

Name: Intelsat Global Sales & Marketing Ltd.  
Address: Building 3, Chiswick Park  
566 Chiswick High Road  
London W4 5YA  
United Kingdom  
Percentage Held: 100% equity  
Citizenship: United Kingdom  
Principal Business: Communications

The following entity will hold a direct ownership interest in Intelsat Global Sales & Marketing Ltd. and a ten percent (10%) or greater indirect ownership interest in Intelsat USA License Corp.

Name: Intelsat Subsidiary Holding Company, Ltd.  
Address: Wellesley House North, 2<sup>nd</sup> Floor  
90 Pitts Bay Road  
Pembroke, HM 08, Bermuda  
Percentage Held: 100% equity  
Citizenship: Bermuda  
Principal Business: Communications

The following entity will hold a direct ownership interest in Intelsat Subsidiary Holding Company, Ltd. and a ten percent (10%) or greater indirect ownership interest in Intelsat USA License Corp.

Name: Intelsat (Bermuda), Ltd.<sup>1</sup>  
Address: Wellesley House North, 2<sup>nd</sup> Floor  
90 Pitts Bay Road  
Pembroke, HM 08, Bermuda  
Percentage Held: 100% equity  
Citizenship: Bermuda  
Principal Business: Communications

The following entity will hold a direct ownership interest in Intelsat (Bermuda), Ltd. and a ten percent (10%) or greater indirect ownership interest in Intelsat USA License Corp.

Name: Intelsat, Ltd.  
Address: Wellesley House North, 2<sup>nd</sup> Floor  
90 Pitts Bay Road  
Pembroke, HM 08, Bermuda  
Percentage Held: 100% equity  
Citizenship: Bermuda  
Principal Business: Communications

The following entity will hold a direct ownership interest in Intelsat, Ltd. and a ten percent (10%) or greater indirect ownership interest in Intelsat USA License Corp.

Name: Intelsat Holdings, Ltd.  
Address: Wellesley House North, 2<sup>nd</sup> Floor  
90 Pitts Bay Road  
Pembroke, HM 08, Bermuda  
Percentage Held: 100% equity  
Citizenship: Bermuda

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<sup>1</sup> Intelsat (Bermuda), Ltd. is expected shortly to transfer substantially all of its assets and liabilities to Intelsat Intermediate Holding Company, Ltd.:

Name: Intelsat Intermediate Holding Company, Ltd.  
Address: Wellesley House North, 2<sup>nd</sup> Floor  
90 Pitts Bay Road  
Pembroke, HM 08, Bermuda  
Percentage Held: 100% equity  
Citizenship: Bermuda  
Principal Business: Communications

Intelsat Intermediate Holding Company, Ltd. will then hold a direct ownership interest in Intelsat Subsidiary Holding Company, Ltd. The insertion of Intelsat Intermediate Holding Company, Ltd. into the ownership chain is a *pro forma* transfer of control that does not require prior approval from the Commission. 47 C.F.R. § 63.24(d).

Principal Business: Communications

The following entities hold ten percent (10%) or more of the equity stock of Intelsat Holdings, Ltd, and a ten percent (10%) or greater indirect ownership in Intelsat USA License Corp.

| Shareholder                            | Jurisdiction of Incorporation | Address   | % of voting <sup>2</sup> and equity stock  |
|--|-------------------------------|---|--|
| AIF V Euro Holdings, L.P.              | Cayman Islands                | c/o Walkers SPV Limited<br>Walker House<br>PO Box 908GT<br>George Town, Grand Cayman<br>Cayman Islands                        | 23.1% of voting stock<br>30.0% of Series A<br>Common Stock<br>24.8% of Series A<br>Preferred Stock |
| Apax WW Nominees Ltd. <sup>3</sup>     | United Kingdom                | 15 Portland Place<br>London W1B 1PT   | 21.4% of voting stock<br>92.8% of Series B<br>Common Stock<br>19.9% of Series A<br>Preferred Stock |
| MDCP IV Global Investments, L.P.       | Cayman Islands                | c/o Walkers SPV Limited<br>PO Box 908GT<br>Walker House<br>Mary Street<br>George Town, Grand Cayman<br>Cayman Islands, B.W.I. | 23.0% of voting stock<br>29.9% of Series A<br>Common Stock<br>24.8% of Series A<br>Preferred Stock |
| Permira Europe III L.P. 2 <sup>4</sup> | Guernsey                      | PO Box 255<br>Trafalgar Court<br>Les Banques<br>St. Peter Port, Guernsey CI,<br>GY1 3QL                                       | 16.6% of voting stock<br>21.5% of Series A<br>Common Stock<br>17.8% of Series A<br>Preferred Stock |

No officers or members of the Intelsat Holdings, Ltd. Board of Directors or officers or members of the Intelsat USA License Corp. Board of Directors serve as officers or directors of foreign carriers.

<sup>2</sup> The percentage of voting stock is calculated by dividing the number of votes represented by the common shares held by the entity by the total number of votes represented by the common shares that are outstanding and have the right to vote.

<sup>3</sup> Registered shareholder for nine entities. Other entities advised by or associated with Apax Partners hold, in the aggregate, an additional 1.7% of voting stock, 7.2% of Series B Common Stock, and 4.9% of Series A Preferred Stock of Intelsat Holdings, Ltd.

<sup>4</sup> Other entities affiliated or otherwise associated with Permira Europe III, L.P. 2 hold, in the aggregate, an additional 6.5% of voting stock, 8.5% of Series A Common Stock, and 7.0% of Series A Preferred Stock of Intelsat Holdings, Ltd.

Response to Question 15

(d) Intelsat USA License Corp. holds the following international Section 214 authorizations: IPC-50; IPC-83-008; ITC-84-150; ITC-85-160; ITC-88-006; ITC-88-207 (CSG-88-090-P/L); ITC-87-097; ITC-91-024; ITC-91-215-A (ITC-92-041, ITC-92-047, ITC-92-074); ITC-92-144; ITC-92-141; ITC-93-046; ITC-93-134; ITC-94-272; ITC-94-351; ITC-95-310; ITC-95-407; ITC-96-173. These Section 214 authorizations permit a wide range of common carrier services, such as satellite television services, cable restoration services, point-to-multipoint Datanet service, international facilities-based and resold services, and space segment services. Intelsat USA License Corp. intends to surrender these licenses upon grant of this application, with the exception of Section 214 authorizations that involve service between the United States and Cuba (ITC-92-141 and ITC-94-272).

(e)(3) Intelsat USA License Corp. does not seek to acquire facilities or to provide services not covered by paragraphs (e)(1) and (e)(2) of the Commission's Rule 63.18.

(g) Not applicable.

### ATTACHMENT 3

#### Response to Question 8

Intelsat USA License Corp. does not seek authorization to provide common carrier switched services. Intelsat USA License Corp.'s indirect parent, Intelsat, Ltd. ("Intelsat"), was acquired earlier this year, pursuant to Commission approval, by a consortium of private investors.<sup>1</sup> In connection with seeking Commission approval of the acquisition, Intelsat engaged in discussions with the United States Department of Justice, including the Federal Bureau of Investigation, the United States Department of Homeland Security, and the United States Department of Defense (collectively, the "Agencies"). As a result of these discussions, Intelsat agreed not to offer common carrier switched services without obtaining prior FCC approval.

The present application seeks to replace Intelsat USA License Corp.'s multiple international Section 214 authorizations with a single authorization providing global authority. Upon grant of this application, Intelsat USA License Corp. will surrender all of its current Section 214 authorizations except for its authorizations to provide service to Cuba, a country on the FCC's exclusion list.

Consistent with the conditions placed on its prior Section 214 authorizations, Intelsat USA License Corp. requests that the global Section 214 authorization sought herein also prohibit Intelsat USA License Corp. from providing common carrier switched services unless it has requested and received prior FCC approval to do so.

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<sup>1</sup> See Letter from Mr. Tom W. Davidson, Akin Gump Strauss Hauer & Feld LLP, to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, (Jan. 28, 2004) (noting consummation of the transaction approved by the Dec. 22, 2004 Order and Authorization in IB Docket No. 04-366).